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Attorneys for Snap Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION,

Case No. 4:22-MD-03047-YGR

MDL No. 3047

THIS DOCUMENT RELATES TO ALL
ACTIONS

**OMNIBUS SEALING STIPULATION
(MARCH 3, 2025 ORDER RESOLVING
PRIVILEGE DETERMINATION AS TO
FOURTEEN SNAP DOCUMENTS)**

Judge: Honorable Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

Pursuant to Civil Local Rules 7-11 and 79-5, the Court's Order on the Stipulated Third Modified Protective Order (ECF No. 1209), this Court's Order Setting Sealing Procedures (ECF No. 341), and the instructions provided in this Court's March 3, 2025 Order Resolving Privilege Determination As To Fourteen Snap Documents ("March 3, 2025 Order") (ECF No. 1732), Plaintiffs and Defendant Snap Inc. ("Snap") submit this Omnibus Stipulation Regarding the Court's March 3, 2025 Order.

The Parties agree that the following filings related to the March 3, 2025 Order should be sealed in their entirety, and so the current sealing should be maintained:

Document	Portion to be Sealed	Designating Party	Basis for Sealing	Whether Previously Sealed
Snap's Exhibit B Bates: SNAP6913291 ECF No. 1732-1	Entire Exhibit	Snap	Good cause exists to seal sensitive and confidential information about Snap's internal ad review practices, advertising and business strategies, relationships with advertising partners, lens product development, and public relations strategies. Disclosure of this information would provide competitors with insight into Snap's business that they would not otherwise have and thereby cause competitive harm to Snap. <i>See Ctr. for Auto Safety v. Chrysler Grp., LLC</i> , 809 F.3d 1092, 1097 (9th Cir. 2016) (even under heightened compelling-reasons standard, it is appropriate to seal "business information that might harm a litigant's competitive standing" (citation omitted)); <i>In re</i>	The Court previously granted the parties' stipulated request to seal the same exhibit (which featured modified redactions for attorney-client and work-product privilege) at ECF No. 1550-5.

Document	Portion to be Sealed	Designating Party	Basis for Sealing	Whether Previously Sealed
			<i>Elec. Arts, Inc.</i> , 298 F. App'x 568, 569 (9th Cir. 2008) (sealing “confidential and commercially sensitive information”); <i>Prescott v. Reckitt Benckiser LLC</i> , 2023 WL 2465778, at *4 (N.D. Cal. Mar. 9, 2023) (sealing “household penetration rates” and defendant’s “target consumer demographics”); <i>Cont'l Auto. Sys., Inc. v. Avanci, LLC</i> , 2019 WL 6612012, at *4 (N.D. Cal. Dec. 5, 2019) (sealing “number of customers using Plaintiff’s products”). This Court has previously granted requests to seal materials related to discovery disputes on this fundamental basis. <i>See, e.g.</i> , ECF Nos. 1242, 1465, 1619.	
Snap’s Exhibit D Bates: SNAP6928318 ECF No. 1732-2	Entire Exhibit	Snap	Good cause exists to seal sensitive and confidential information about Snap’s internal moderation practices and business strategies. Disclosure of this information would provide competitors with insight into Snap’s business that they would not otherwise have and thereby cause competitive harm to Snap. <i>See</i> [above cited case law]. This Court has previously granted requests to seal materials related to discovery	The Court previously granted the parties’ stipulated request to seal the same exhibit (which featured modified redactions for attorney-client and work-product

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			disputes on this fundamental basis. <i>See, e.g.</i> , ECF Nos. 1242, 1465, 1619.	privilege) at ECF No. 1550-9.
Snap's Exhibit F Bates: SNAP6955026 ECF No. 1732-3	Entire Exhibit	Snap	Good cause exists to seal sensitive and confidential information about Snap's internal policy enforcement mechanisms, account investigation practices, and cooperation with law enforcement investigations. Disclosure of this information would provide competitors with insight into Snap's practices that they would not otherwise have and thereby cause competitive harm to Snap. <i>See</i> [above cited case law]. This Court has previously granted requests to seal materials related to discovery disputes on this fundamental basis. <i>See, e.g.</i> , ECF Nos. 1242, 1465, 1619.	The Court previously granted the parties' request to seal the same exhibit (which featured modified redactions for attorney-client and work-product privilege) at ECF No. 1550-13.
Snap's Exhibit G Bates: SNAP6960749 ECF No. 1732-4	Entire Exhibit	Snap	Good cause exists to seal sensitive and confidential information about Snap's internal investigation practices and cooperation with law enforcement investigations. Disclosure of this information would provide competitors with insight into Snap's practices that they would not otherwise have and thereby cause competitive harm to Snap. <i>See</i> [above cited	The Court previously granted the parties' stipulated request to seal the same exhibit (which featured modified redactions for attorney-

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			case law]. This Court has previously granted requests to seal materials related to discovery disputes on this fundamental basis. <i>See, e.g.</i> , ECF Nos. 1242, 1465, 1619.	client and work-product privilege) at ECF No. 1550-15.
Snap's Exhibit H Bates: SNAP6969803 ECF No. 1732-5	Entire Exhibit	Snap	Good cause exists to seal sensitive and confidential information about Snap's internal investigation practices, cooperation with law enforcement investigations, and media and communications strategies. Disclosure of this information would provide competitors with insight into Snap's practices that they would not otherwise have and thereby cause competitive harm to Snap. <i>See</i> [above cited case law]. This Court has previously granted requests to seal materials related to discovery disputes on this fundamental basis. <i>See, e.g.</i> , ECF Nos. 1242, 1465, 1619.	The Court previously granted the parties' stipulated request to seal the same exhibit (which featured modified redactions for attorney-client and work-product privilege) at ECF No. 1550-17.

Pursuant to this case's sealing procedures, a Proposed Order implementing this stipulation and slipsheets of Exhibits B, D, F, G, and H to be sealed in their entirety as agreed by the Parties listed above are attached.

IT IS SO STIPULATED AND AGREED.

1 Dated: March 28, 2025

Respectfully submitted,

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ATTESTATION

I, Laura M. Lopez, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

DATED: March 28, 2025

By: /s/ Laura M. Lopez
Laura M. Lopez